

September 6, 2022

VIA ECF

The Honorable Sarah L. Cave
 United States Magistrate Judge
 Southern District of New York
 500 Pearl Street
 New York, NY 10007

Re: *DoorDash, Inc. v. City of New York*, No. 21 Civ. 7695-AT-SLC
Portier, LLC v. City of New York, No. 21 Civ. 10347-AT-SLC
Grubhub Inc. v. City of New York, No. 21 Civ. 10602-AT-SLC

Judge Cave:

Pursuant to the Court's September 1, 2022 Order, Co-Plaintiffs DoorDash, Inc. ("DoorDash"), Portier, LLC ("Portier"), and Grubhub Inc. ("Grubhub"), and Defendant City of New York ("the City") respectfully submit this Joint Letter to propose a schedule for the completion of remaining discovery in advance of the September 7, 2022 Telephonic Discovery Conference.

As discussed in the parties' August 31, 2022 Joint Letter, while the parties have made and continue to make progress on discovery, the parties all agree that good cause exists to extend the case-management deadlines to allow sufficient time for production of documents and written discovery and for depositions, while also ensuring just and efficient determination of the issues in these consolidated cases. In crafting this joint proposal, the parties also have attempted to account for certain holidays and expected periods of witness unavailability, in order to develop a schedule that is feasible and realistic. Accordingly, the parties respectfully submit for the Court's consideration the following revised case management schedule:

Event	Current Deadline	Proposed Extension
Deadline to M&C re need for expert discovery	Wednesday, September 7, 2022	Friday, November 4, 2022
Deadline to serve RFAs	Friday, September 9, 2022	Friday, December 23, 2022
End of fact depositions	Friday, September 23, 2022	Tuesday, January 31, 2023
End of fact discovery	Friday, October 7, 2022	Friday, February 10, 2023
End of expert discovery	Monday, November 21, 2022	Friday, March 31, 2023

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The parties have made one previous request for an extension of these deadlines on April 22, 2022, Dkt. 65, which the Court granted on April 26, 2022. Dkt. 66.

Respectfully submitted,

/s/ Anne Champion
Anne Champion

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/s/ John Quinn
John Quinn

Counsel for Plaintiff Portier, LLC.

/s/ Karen B. Selvin
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Counsel for Defendant City of New York

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